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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,) No. 4:21-cr-00019-RRB-SAO
)
Plaintiff,) <u>COUNT 1:</u>
) FELON IN POSSESSION OF
) FIREARMS
) Vio. of 18 U.S.C. §§ 922(g)(1) and
vs.) 924(a)(2)
)
JAY ALLEN JOHNSON,) <u>COUNT 2:</u>
) THREAT TO MURDER UNITED
) STATES OFFICIAL
) Vio. Of 18 U.S.C. § 115(a)(1)(B),
) (b)(4)
)
) <u>COUNT 3:</u>
) THREAT TO MURDER UNITED
) STATES OFFICIAL
) Vio. of 18 U.S.C. § 115(a)(1)(B),
) (b)(4)
)
)
)
)

) COUNT 4:
) THREAT TO DESTROY REAL
) PROPERTY BY FIRE
) Vio. of 18 U.S.C. § 844(e)
)
) COUNT 5:
) THREATENING INTERSTATE
) COMMUNICATION
) Vio. of 18 U.S.C. § 875(c)
)
) COUNT 6:
) THREATENING INTERSTATE
) COMMUNICATION
) Vio. of 18 U.S.C. § 875(c)
)
) CRIMINAL FORFEITURE
) ALLEGATION:
) Vio. of 18 U.S.C. § 924(d) and 28
) U.S.C. § 2461(c) and Rule 32.2
)

INDICTMENT

The Grand Jury charges that:

COUNT 1

Beginning on or about October 2, 2021, and continuing through on or about October 4, 2021, within the District of Alaska, the defendant, JAY ALLEN JOHNSON, knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting interstate and foreign commerce, seven firearms, to wit:

1. One pistol, Taurus, Model: PT111 G2, Cal: 9mm;
2. One shotgun, Mossberg, Model: 835, Cal: 12;
3. One revolver, Smith & Wesson, Model: 57, Cal: .41;

4. One rifle, Marlin, Model: 30AS, Cal: .30-30;
5. One revolver, Interarms, Model: Virginian Dragoon, Cal: .44;
6. One revolver, Smith & Wesson, Model: 10-7, Cal: .38;
7. One pistol, FN, Model: 509, Cal: 9mm.

Convictions

Conviction Date	Offense	Court	Case No
May 19, 2016	Felony DUI – 2+ Priors	State of Alaska	4DJ-14-00064CR

All of which is in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT 2

On or about September 28, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, threatened to assault and murder a United States Official; to wit, a United States Senator (Senator 1), with intent to impede, intimidate, and interfere with Senator 1 while engaged in the performance of her official duties, and to retaliate against Senator 1 on account of the performance of her official duties by calling Senator 1's office and leaving a voicemail threatening to assault and murder Senator 1.

All of which is in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

COUNT 3

On or about September 20, 21, 22, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, threatened to assault and murder a United States Official; to wit, a United States Senator (Senator 2), with intent to impede,

intimidate, and interfere with Senator 2 while engaged in the performance of his official duties, and to retaliate against Senator 2 on account of the performance of his official duties by calling Senator 2's office and leaving a voicemail threatening to assault and murder Senator 2.

All of which is in violation of 18 U.S.C. § 115(a)(1)(B), (b)(4).

COUNT 4

On or about September 2, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, through the use of a telephone and other instrument of interstate and foreign commerce, willfully made any threat to kill, injure, and intimidate any individual and unlawfully damage and destroy any building, vehicle, and other real and personal property by means of fire and explosives; to wit, while located in Alaska, calling the office of a United States Senator (Senator 1) and leaving a voicemail threatening to burn the real and personal properties of Senator 1.

All of which is in violation of 18 U.S.C. § 844(e).

COUNT 5

On or about September 28, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, for the purpose of issuing a threat, knowingly transmitted in interstate and foreign commerce a communication containing any threat to injure the person of another; to wit, while located in Alaska, calling the Washington, D.C. office of a United States Senator (Senator 1) and leaving a voicemail threatening to assault and murder Senator 1.

All of which is in violation of 18 U.S.C. § 875(c).

COUNT 6

On or about September 20, 21, 22, 2021, within the District of Alaska and elsewhere, the defendant, JAY ALLEN JOHNSON, for the purpose of issuing a threat, knowingly transmitted in interstate and foreign commerce a communication containing any threat to injure the person of another; to wit, while located in Alaska, calling the Washington, D.C. office of a United States Senator (Senator 2) and leaving a voicemail threatening to assault and murder Senator 2.

All of which is in violation of 18 U.S.C. § 875(c).

CRIMINAL FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to 18 U.S.C. § 924(d), and 28 U.S.C. § 2461(c).

Upon conviction of an offense in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), the defendant, JAY ALLEN JOHNSON, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearm or ammunition involved in or used in knowing violation of the offense, including, but not limited to the following:

8. One pistol, Taurus, Model: PT111 G2, Cal: 9mm, Serial #: TIU36585
9. One shotgun, Mossberg, Model: 835, Cal: 12, Serial #: UM858581
10. One revolver, Smith & Wesson, Model: 57, Cal: .41, Serial #: N474238
11. One rifle, Marlin, Model: 30AS, Cal: .30-30, Serial #: 10024789

12. One revolver, Interarms, Model: Virginian Dragoon, Cal: .44, Serial #: 5282

13. One revolver, Smith & Wesson, Model: 10-7, Cal: .38, Serial #: 54105

14. One pistol, FN, Model: 509, Cal: 9mm, Serial #: GKS0073324

All pursuant to 18 U.S.C. § 924(d), 28 U.S.C. § 2461(c), and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

s/ Grand Jury Foreperson
GRAND JURY FOREPERSON

s/ Christina Sherman for
RYAN D. TANSEY
Assistant U.S. Attorney
United States of America

s/ Christina Sherman for
E. BRYAN WILSON
Acting United States Attorney
United States of America

DATE: November 16, 2021